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March 13, 2020

VIA ECF

The Honorable Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Grottano, et al. v. City of N.Y., et al.*, 15 Civ. 9242 (RMB) (KNF)

Dear Judge Berman:

We are co-counsel to Plaintiffs in the above referenced case. We write to update the Court about the status of the settlement process. The claims period expires on April 27, 2020. The Parties have discussed and expect to pursue a revised settlement structure that will include supplemental notice and a refined claims form, one that is better calibrated to identify individuals who fit within the class definition. The Parties are still negotiating the details, and we hope to reach agreement soon. Therefore, we ask the Court to give Plaintiffs until April 10, 2020, to submit their proposal to the Court.

Sincerely,

Raymond Audain
Raymond Audain